

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TASER INTERNATIONAL, INC.,)
et al.)
Plaintiffs,) CIVIL ACTION
vs.) FILE NO.:
MORGAN STANLEY & CO., INC.,) 1:10-CV-03108-JOF
et al.,)
Defendants.)

VIDEOTAPED DEPOSITION OF
JANE S. MAJ
JANUARY 27, 2011
9:15 A.M.
BONDURANT, MIXSON & ELMORE
1201 WEST PEACHTREE STREET, N.W.
SUITE 3900
ATLANTA, GEORGIA

CONTAINS CONFIDENTIAL PORTIONS
PURSUANT TO PROTECTIVE ORDER

REPORTED BY:
SUZANNE BEASLEY, RPR
CCR-B-1184

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<p>1 A. Yes. 17:23:40</p> <p>2 Q. And how do you know that it is an account 17:23:40</p> <p>3 that's located in Georgia? 17:23:43</p> <p>4 A. Maybe I've heard it from Dick Haskell. 17:23:45</p> <p>5 And here's the address right here, James Baker, 17:23:47</p> <p>6 One Ravinia Drive. 17:23:50</p> <p>7 Q. Now, going to just briefly about your 17:24:01</p> <p>8 trust, who are the beneficiaries of the Jane S. Maj 17:24:05</p> <p>9 Trust? 17:24:12</p> <p>10 A. I am. 17:24:12</p> <p>11 Q. Anyone else? 17:24:13</p> <p>12 A. My brother. 17:24:16</p> <p>13 Q. Your brother. What is your brother's 17:24:17</p> <p>14 name? 17:24:21</p> <p>15 A. Ted. 17:24:21</p> <p>16 Q. Ted Maj? 17:24:21</p> <p>17 A. Yes, M-a-j. 17:24:23</p> <p>18 Q. And how do you fund the trust? Does Ted 17:24:28</p> <p>19 also contribute? 17:24:32</p> <p>20 A. No. 17:24:34</p> <p>21 Q. Only you contribute funds to -- 17:24:34</p> <p>22 A. Correct. 17:24:38</p> <p>23 Q. And no one else? 17:24:39</p> <p>24 A. Correct. 17:24:40</p> <p>25 Q. And only yourself and Ted Maj are the 17:24:41</p>	<p>1 question. And we reserve rights, including 17:25:58</p> <p>2 to move to compel answers to this question 17:26:02</p> <p>3 as well as reopen this deposition. 17:26:07</p> <p>4 MR. CAPLAN: I would suggest that you 17:26:10</p> <p>5 meet and confer before you compel. 17:26:12</p> <p>6 BY MS. NUNN: 17:26:18</p> <p>7 Q. Are you going to follow your attorney's 17:26:18</p> <p>8 advice? 17:26:20</p> <p>9 A. I don't know. 17:26:20</p> <p>10 MR. CAPLAN: You're going to follow 17:26:21</p> <p>11 my advice. I instruct you to. Don't 17:26:23</p> <p>12 answer the question. 17:26:26</p> <p>13 MS. NUNN: That was a joke among 17:26:27</p> <p>14 attorneys. 17:26:29</p> <p>15 THE WITNESS: I am sure of that. 17:26:30</p> <p>16 BY MS. NUNN: 17:26:31</p> <p>17 Q. You understand if I successfully challenge 17:26:31</p> <p>18 your attorney's instructions for you not to answer 17:26:40</p> <p>19 that you will be required to come back at your 17:26:43</p> <p>20 expense to answer the question, correct? 17:26:46</p> <p>21 A. Okay. 17:26:50</p> <p>22 Q. How much money have you personally spent 17:26:50</p> <p>23 to date on this litigation? 17:27:10</p> <p>24 MR. CAPLAN: Same objection and same 17:27:12</p> <p>25 instruction. 17:27:14</p>
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<p>1 beneficiaries of the trust? 17:24:45</p> <p>2 A. Yes. 17:24:47</p> <p>3 Q. Do you have any documents related to the 17:24:47</p> <p>4 trust? 17:24:49</p> <p>5 A. Yes. 17:24:50</p> <p>6 Q. Did you produce any of those documents to 17:24:50</p> <p>7 your attorneys? 17:24:54</p> <p>8 A. I don't remember if I did. 17:24:56</p> <p>9 Q. We may seek copies of documents related to 17:24:58</p> <p>10 the trust. 17:25:07</p> <p>11 A. You're asking me if you may? 17:25:10</p> <p>12 Q. No. I'm just letting you know. I'll work 17:25:16</p> <p>13 with your attorneys. 17:25:19</p> <p>14 A. Okay. 17:25:20</p> <p>15 Q. How much money have you spent on 17:25:21</p> <p>16 attorney's fees to date in this litigation? 17:25:23</p> <p>17 MR. CAPLAN: Object to the form and 17:25:27</p> <p>18 the foundation, and I direct the witness 17:25:27</p> <p>19 not to respond. And I will say here that 17:25:30</p> <p>20 we have discussed this issue in prior 17:25:34</p> <p>21 depositions and suggested that the 17:25:38</p> <p>22 attorneys have a conferral on this issue, 17:25:41</p> <p>23 and to date have not received any inquiry. 17:25:47</p> <p>24 MS. NUNN: We believe it is improper 17:25:52</p> <p>25 for you to instruct her not to answer this 17:25:55</p>	<p>1 THE WITNESS: I don't remember. 17:27:17</p> <p>2 BY MS. NUNN: 17:27:17</p> <p>3 Q. Are you aware of any settlement offer in 17:27:19</p> <p>4 this litigation? 17:27:22</p> <p>5 A. No, I'm not. 17:27:23</p> <p>6 Q. Did your attorney ever inform you that you 17:27:24</p> <p>7 were offered \$1,000? 17:27:27</p> <p>8 A. Yes. 17:27:29</p> <p>9 Q. And did you decline? 17:27:30</p> <p>10 A. Yes, I did. 17:27:33</p> <p>11 Q. Why did you decline the \$1,000 offer? 17:27:34</p> <p>12 MR. CAPLAN: I object to this 17:27:54</p> <p>13 question and instruct the witness that you 17:27:55</p> <p>14 may answer the question insofar that it 17:27:59</p> <p>15 doesn't require that you reveal 17:28:01</p> <p>16 attorney-client privileged communications. 17:28:04</p> <p>17 I'll also note for the record that I 17:28:06</p> <p>18 consider this line of questioning to be 17:28:09</p> <p>19 intimidating and harassing. 17:28:11</p> <p>20 BY MS. NUNN: 17:28:13</p> <p>21 Q. You can answer. 17:28:13</p> <p>22 A. I don't remember. 17:28:14</p> <p>23 Q. Do you have an engagement letter or 17:28:14</p> <p>24 retainer agreement with your attorneys? 17:28:17</p> <p>25 A. Excuse me? 17:28:21</p>